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**Attorneys for Plaintiffs**  
**DITECH FINANCIAL LLC and**  
**FEDERAL NATIONAL MORTGAGE**  
**ASSOCIATION**

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

DITECH FINANCIAL LLC; FEDERAL  
NATIONAL MORTGAGE ASSOCIATION, a  
government-sponsored entity,

Plaintiffs,

v.

LOCKMOR HOLDINGS, LLC.; DOES 1  
through 10, inclusive; ROES Business Entities 1  
through 10, inclusive; and all others who claim  
interest in the subject property located at 520  
Arrowhead Trail, #1122, Henderson, NV 89015 .

Defendants.

CASE NO.: 2:17-cv-01829-JAD-PAL

**STIPULATION AND ORDER TO EXTEND  
TIME TO RESPOND TO MOTIONS**

**(FIRST REQUEST)**

Pursuant to LR 6-1(b), DITECH FINANCIAL LLC (formerly known as Green Tree Servicing LLC (hereinafter “Ditech”), FEDERAL NATIONAL MORTGAGE ASSOCIATION (hereinafter “Fannie Mae”) and Lockmor Holdings, LLC (hereinafter after to as “Lockmor”) by and through their attorneys, hereby stipulate as follows:

WHEREAS, on September 1, 2017, Defendant Lockmor moved to dismiss. ECF No. 14.

WHEREAS, Fannie Mae and Ditech’s response to the Motion to Dismiss is due September 15, 2017.

WHEREAS, on September 1, 2017, Ditech moved for summary judgment. ECF No. 15.

WHEREAS, Lockmor’s response to the Motion for Summary Judgment is due on September

1 22, 2017.

2 WHEREAS the parties wish to extend the deadlines.

3 Good cause exists to extend the response deadlines based on the volume of cases raising  
4 similar issues handled by counsel for Ditech and Fannie Mae. An extension for Ditech and Fannie  
5 Mae to respond to Defendant's Motion to Dismiss will allow Ditech and Fannie Mae the opportunity  
6 to more properly address the myriad of substantive issues raised in the Motion to Dismiss, including,  
7 *inter alia*, the Federal Foreclosure Bar and the constitutionality of NRS 116.3116, *et al.* An  
8 extension for Lockmor to respond to Ditech's Motion for Summary Judgment will allow it the  
9 opportunity to more properly address the various issues concerning the constitutionality of NRS  
10 116.3116, *et al.*

11 Therefore, the parties stipulate and agree as follows:

12 THAT Ditech and Fannie Mae shall be granted an extension to **September 29, 2017** to file  
13 their Response to Defendant's Motion to Dismiss (ECF No. 14).

14 THAT Lockmor shall be granted an extension to **October 6, 2017** to file its Response to  
15 Ditech's Motion for Summary Judgment (ECF No. 15).

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1 THAT this stipulated extension is not submitted for any improper purpose or delay.  
2 **IT IS SO STIPULATED.**  
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4 DATED: September 13, 2017

WOLFE & WYMAN LLP

6 By: /s/ Colt B. Dodrill

7 COLT B. DODRILL, ESQ.  
8 Nevada Bar No. 9000  
6757 Spencer St.  
Las Vegas, NV 89119

9 Attorneys for Plaintiffs  
10 DITECH FINANCIAL LLC and FEDERAL  
NATIONAL MORTGAGE ASSOCIATION

11 DATED: September 13, 2017

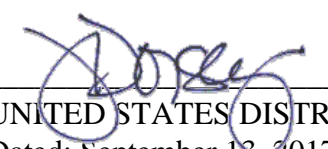
MCCOY LAW GROUP, Ltd.

14 By: /s/ Brandon McCoy

15 BRANDON MCCOY, ESQ.  
16 Nevada Bar No. 10402  
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Las Vegas, NV 89101

17 Attorneys for Defendant  
18 LOCKMOR HOLDINGS, LLC

19 **IT IS SO ORDERED.**

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22 UNITED STATES DISTRICT JUDGE  
Dated: September 13, 2017.